

EXHIBIT 1

EXHIBIT 1**Defendants' Custodial Document Review Proposal**

Category	Proposal
Total Number of Documents To Review	<ul style="list-style-type: none"> Defendants will review up to 1.5 million documents for responsiveness to Plaintiffs' custodial document requests (about 24,000 documents per day, from October 3, 2024 to January 15, 2025) Approximately 600,000 of these documents are left over from the DOJ CID review The remaining 900,000 will be subject to (1) review utilizing TAR 2.0 and (2) a linear review for documents that are not amenable to TAR analysis, based on the parameters below
Custodians	<ul style="list-style-type: none"> 41 custodians identified as "Undisputed" in Exhibit 2 to Plaintiffs' letter-motion (ECF No. 320-2)
Date Range	<ul style="list-style-type: none"> For DOJ CID custodians: 1/1/2023 to 5/23/2024 (given that the CID date range covered 1/1/2017 to 12/31/2022) <ul style="list-style-type: none"> <u>Exceptions</u>: Plaintiffs are not seeking documents from Patti Kim or Stacie George after 12/31/2023; their collection will be limited to 1/1/2023 to 12/31/2023 For non-DOJ CID custodians: 1/1/2017 to 5/23/2024
Search Terms	<ul style="list-style-type: none"> Search terms used for DOJ CID, with limited modifications to account for differences between the investigation and litigation
Document Types	<ul style="list-style-type: none"> Emails and attachments; documents hyperlinked in emails; chats; texts These document sources are the most likely to be relevant, and given that Defendants are producing hyperlinked attachments, this set will also include many documents stored in other sources